

Exhibit B

STATE OF INDIANA)	HAMILTON COUNTY SUPERIOR COURT 2
) SS:	
COUNTY OF HAMILTON)	CAUSE NO. 29C01-1809-CC-008218
NEXTGEAR CAPITAL, INC.,)	
Plaintiff,)	
)	
v.)	
)	
CT102 LLC D/B/A JD BYRIDER)	
OF NEW HAVEN AND METRO)	
MOTORS, AND HERMAN)	
JEFFREY BAKER,)	
Defendants.)	

ANSWER AND AFFIRMATIVE DEFENSES

Comes now Defendants, by counsel, and tenders the Answer and Affirmative Defenses in response to the Complaint, and in support state as follows:

ANSWER

1. The Defendants are without sufficient information to admit or deny the allegations in paragraph 1 of the Complaint.
2. The Defendants deny the allegations in paragraph 2 of the Complaint.
3. The Defendants admit the allegations in paragraph 3 of the Complaint.
4. The Defendants deny the allegations in paragraph 4 of the Complaint.
5. The Defendants deny the allegations in paragraph 5 of the Complaint.
6. The Defendants deny the allegations in paragraph 6 of the Complaint.
7. The Defendants deny the allegations in paragraph 7 of the Complaint.
8. The Defendants deny the allegations in paragraph 8 of the Complaint.
9. The Defendants deny the allegations in paragraph 9 of the Complaint.
10. The Defendants deny the allegations in paragraph 10 of the Complaint.

11. The Defendants deny the allegations in paragraph 11 of the Complaint.
12. The Defendants deny the allegations in paragraph 12 of the Complaint.
13. The Defendants deny the allegations in paragraph 13 of the Complaint.
14. Defendants reincorporate the answers by reference to the allegations in paragraphs 1-13 of the Complaint.
15. The Defendants deny the allegations in paragraph 15 of the Complaint.
16. The Defendants deny the allegations in paragraph 16 of the Complaint.
17. The Defendants deny the allegations in paragraph 17 of the Complaint.
18. The Defendants deny the allegations in paragraph 18 of the Complaint.
19. The Defendants deny the allegations in paragraph 19 of the Complaint.
20. The Defendants reincorporate the answers by reference to the allegations in paragraphs 1-19 of the Complaint.
21. The Defendants deny the allegations in paragraph 21 of the Complaint.
22. The Defendants deny the allegations in paragraph 22 of the Complaint.
23. The Defendants deny the allegations in paragraph 23 of the Complaint.
24. The Defendants deny the allegations in paragraph 24 of the Complaint.
25. The Defendants deny the allegations in paragraph 25 of the Complaint.
26. The Defendants deny the allegations in paragraph 26 of the Complaint.
27. Defendants reincorporate the answers by reference to the allegations in paragraphs 1-26 of the Complaint.
28. The Defendants deny the allegations in paragraph 28 of the Complaint.
29. The Defendants deny the allegations in paragraph 29 of the Complaint.
30. The Defendants deny the allegations in paragraph 30 of the Complaint.

31. The Defendants deny the allegations in paragraph 31 of the Complaint.
32. The Defendants deny the allegations in paragraph 32 of the Complaint.
33. The Defendants deny the allegations in paragraph 33 of the Complaint.
34. The Defendants deny the allegations in paragraph 34 of the Complaint.
35. The Defendants deny the allegations in paragraph 35 of the Complaint.
36. The Defendants deny the allegations in paragraph 36 of the Complaint.

WHEREFORE, Defendants, by counsel, respectfully request that Plaintiff take nothing against them by way of Plaintiff's Complaint, and for all other just and proper relief in the premises.

AFFIRMATIVE DEFENSES

Defendants, by counsel, state as follows for their Affirmative Defenses:

1. Failure to state a claim upon which relief can be granted;
2. The procedural rules have not been followed;
3. The documents attached are not true and accurate copies;
4. Improper venue;
5. Plaintiff is in breach of contract;
6. False and fraudulent charges by Plaintiff;
7. The acts/omissions alleged are by third parties and not by Defendant;
8. Laches;
9. Plaintiff's own conduct / unclean hands;
10. Estoppel;
11. Plaintiff has been unjustly enriched;
12. Accord and satisfaction;
13. Failure to mitigate damages;

14. Good faith by Defendants;

15. Acquiescence;

16. Defendants are entitled to an offset/setoff;

17. Defendants, by counsel, reserve the right to assert additional affirmative and other defenses as they may become applicable during the course of discovery.

WHEREFORE, Defendants, by counsel, respectfully request that Plaintiff take nothing against them by way of Plaintiff's Complaint, and for all other just and proper relief in the premises.

Respectfully submitted,

CAMDEN & MERIDEW, P.C.

/s/ Julie A. Camden
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CERTIFICATE OF SERVICE

I certify that on **October 8, 2018**, I electronically filed the foregoing document using the Indiana EFiling System (IEFS). I also certify that on **October 8, 2018** the foregoing document was served upon the following person via IEFS:

Michael Gibson
Amanda Stafford

/s/Julie A. Camden
Julie A. Camden, # 26789-49